

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:23-cv-23004-WPD

JANE DOE, a minor, by and through her
mother and next friend, MOTHER DOE,

Plaintiff,

v.

ACADEMIR CHARTER SCHOOLS,
INC., and SUPERIOR CHARTER
SCHOOL SERVICES, INC.,

Defendants.

**DEFENDANTS' UNOPPOSED MOTION TO FOR EXTENSION OF
TIME TO RESPOND TO MOTION FOR DEFAULT JUDGMENT AND
FOR SANCTIONS (DE 34) AND MOTION FOR EXTENSION OF TIME
TO RESPOND TO DISCOVERY**

Defendants, SUPERIOR CHARTER SCHOOL SERVICES, INC., and
ACADEMIR CHARTER SCHOOLS, INC., through their undersigned counsel,
move this court for an extension of time through July 22, 2024, to file their
Response in Opposition to Plaintiff's Motion for Default Judgment and for
Sanctions for an extension of time through July 22, 2024 to respond to
Plaintiff's Second Set of Interrogatories and Second Request for Production,
both served on June 11, 2024, for the following reasons:

1. On July 2, 2024, Plaintiff filed a Motion for Default Judgment and for
Sanctions alleging serious discovery violations which Plaintiff contends

supports serious sanctions, including the entry of a default judgment against Defendants. According to the local rules of court, Defendants' Response in Opposition to the Motion is due on or before July 17, 2024.

2. Defendants request an extension of time through July 22, 2024, within which to respond to the motion in order to obtain proper affidavits and otherwise properly respond to the motion. The motion was filed just prior to the July 4 holiday, and counsel for Superior Charter Schools, Inc. was out of town for an extended time through July 8. Additionally Counsel for Defendant Academir departed her previous law firm on or about June 21, 2024, and did not receive permission from the insurance carrier to take the case to her new firm, Kelly Kronenberg, until July 11, 2024. This delay has significantly hindered counsel's ability to gather discovery and prepare a response to the sanctions motion.

3. Defendants further move for an extension of time to respond to Plaintiff's Second Set of Interrogatories and Second Request for Production, both served on June 11, 2024, for the reasons set forth above.

4. Counsel for Plaintiff has been contacted and has advised by email that he has no opposition to this motion being granted.

WHEREFORE, Defendant, SUPERIOR CHARTER SCHOOL SERVICES, INC., and ACADEMIR CHARTER SCHOOLS, INC., move this court for an extension of time through July 22, 2024, to file their Response in

Opposition to Plaintiff's Motion for Default Judgment and for Sanctions for an extension of time through July 22, 2024, to respond to Plaintiff's Second Set of Interrogatories and Second Request for Production, both served on June 11, 2024.

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that I accordance with LR 7.1(a)(3) that I conferred with all parties affected by the relief set forth in the motion by email, and all parties agree to the granting of the motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 16, 2024, a true and correct copy of the foregoing was electronically filed with the Clerk of Court via the CM/ECF which will serve the parties by email on the service list below.

s/ Scott P. Yount

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